FO		ES DISTRICT COURT T OF MASSACHUSETTS [M]
MIGUEL A. CINTRON,)	US DISTRICT COURT
	Plaintiff,	CIVIL ACTION NO. 04-112930-REK
v.)	
PETER V. MCLOUGHLIN, and SYSTEMS MARKETING, INC.,		
	Defendants.)	

JOINT MOTION TO EXTEND DISCOVERY DEADLINES

Defendants Peter V. McLoughlin and Systems Marketing, Inc. ("Defendants"), together with Plaintiff Miguel A. Cintron ("Plaintiff") hereby move to extend the discovery deadline in this case as set forth below, for the following reasons:

- 1. The parties' Joint Statement Pursuant to Local Rule 16.1(D), filed November 15, 2004, provided that all depositions in this case would be completed by July 1, 2005.
- 2. Defendants and Plaintiff have produced documents and propounded and answered interrogatories but have not taken any depositions because they were exploring settlement of this matter.
- 3. As settlement efforts have been unproductive, the parties now wish to have an extension of time in which to take depositions until October 31, 2005, in order to prepare for trial.

For the above reasons, Defendants and Plaintiff respectfully request the Court to extend the time in which they may take depositions until October 31, 2005.

Respectfully submitted,

PETER V. MCLOUGHLIN and SYSTEMS MARKETING, INC. By their attorneys,

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Dated: August 22, 2005